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10 Attorneys for Plaintiff
11 IBUUMERANG

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14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 IBUUMERANG, LLC, a Texas Limited
17 Liability Company

18 Plaintiff,

19 vs.

20 T1 PAYMENTS LLC, a Nevada limited
liability company; T1 PAYMENTS
21 LIMITED, a United Kingdom private limited
company; TGLOBAL SERVICES LIMITED,
a United Kingdom private limited company;
DONALD KASDON, an individual; DEBRA
22 KAREN KING aka DEBRA KAREN
KASDON, an individual; AMBER
FAIRCHILD, an individual; PAYVISION
23 B.V., a Netherlands limited company;
PIXXLES, Ltd., a United Kingdom private
limited company and CETLER, a
Netherlands limited liability company

24 Defendants.
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27 CASE NO. 2:21-cv-01611-JCM-VCF

28
STIPULATION FOR EXTENSION OF
DEADLINE TO FILE OPPOSITION AND
REPLY TO DEFENDANT PAYVISION
B.V.'S MOTION TO DISMISS

1 Plaintiff, Ibuumerang, LLC. ("Ibuumerang") and Defendant Payvision B.V. ("Payvision")
2 hereby stipulate and agree as follows:

3 WHEREAS, Defendant Payvision B.V. filed their FRCP Rule 12(b)(2), 12(b)(6), 9(b) Motion
4 to Dismiss the First Amended Complaint (the "Motion") (ECF No. 15) on November 12, 2021.

5 WHEREAS, the deadline for Plaintiff's opposition is November 29, 2021.

6 WHEREAS, Plaintiff's counsel is out of the country on a pre-arranged trip until November
7 30, 2021.

8 WHEREAS, the parties have not stipulated to any prior continuances.

9 WHEREAS, Plaintiff's counsel and Defendant's counsel met and conferred via telephone
10 and agreed to extend the deadline for Plaintiff to file their opposition to December 6, 2021 as long
11 as the deadline for Defendant to file their reply is extended to December 20, 2021.

12 WHEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between Ibuumerang
13 and Defendant, through their respective counsel of record that good cause exists to extend the
14 deadline for Ibuumerang's opposition from November 29, 2021 to December 6, 2021 and to extend
15 the deadline for Defendant's reply from December 13, 2021 to December 20, 2021.

16
17 DATED: November 24, 2021

SLIGHTING LAW

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19 By: /s/ Bradley S. Slighting
20 Bradley S. Slighting, Esq.
21 Plaintiff,
Ibuumerang, LLC.

22
23 DATED: November 24, 2021

WELLMAN & WARREN

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25 By: /s/ Scott Wellman
26 Scott Wellman, Esq.
Plaintiff,
Ibuumerang, LLC.

1 DATED: November 24, 2021

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GIIBS GIDEN LOCHER TURNER SENET &
WITTBRODT

4 By: /s/Richard Edward Haskin
5 Richard Edward Haskin, Esq.
Defendant,
6 Payvision B.V.

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CERTIFICATE OF SERVICE

I hereby certify, under penalty of perjury, under the laws of the United States of America that on this date, I caused to be electronically filed the foregoing document, and this Certificate of ECF Filing & Service, with the Clerk of the Court using the CM/ECF system, who will send notification of such filing to the following party:

Attorneys for Defendants

ARI N. ROTHMAN, VENABLE LLP; anrothman@venable.com

KORY L. KAPLAN, KAPLAN COTTNER; kory@kaplancottner.com

Attorneys for T1 Payments LLC

RICHARD EDWARD HASKIN, GIIBS GIDEN LOCHER TURNER SENET & WITTBRODT

Nathan D. O'Malley, Peter J. Diedrich, Giorgio A. Sassine, MUSICK, PEELER & GARRETT LLP

Attorneys for PayVision B.V., a Netherlands Limited Company.

DATED this 24th day of November 2021, at Laguna Hills, California.

/s/ Kelsey Schafer

Paralegal

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13 swellman@w-wlaw.com

14 Attorneys for Plaintiff,
15 IBUUMERANG _____

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

IBUUMERANG, INC. a Texas Limited
Liability Company

Plaintiff,

vs.

T1 PAYMENTS LLC, a Nevada limited
liability company; T1 PAYMENTS
LIMITED, a United Kingdom private limited
company; TGLOBAL SERVICES LIMITED,
a United Kingdom private limited company;
DONALD KASDON, an individual; DEBRA
KAREN KING aka DEBRA KAREN
KASDON, an individual; AMBER
FAIRCHILD, an individual; PAYVISION
B.V., a Netherlands limited company;
Pixxles, Ltd., a United Kingdom private
limited company

Defendants.

Case No. 2:21-cv-01611-JCM-VCF

Judge: Hon. James C. Mahan
Magistrate Judge: Cam Ferenbach

**ORDER CONTINUING
DEADLINE TO FILE OPPOSITION AND
REPLY TO DEFENDANT PAYVISION
B.V.'S MOTION TO DISMISS**

The Court having received, reviewed, and considered the parties'

1 Stipulation to Continue the deadline to file opposition and reply to Defendant
2 Payvision B.V.'s Motion to Dismiss.

3 NOW THEREFORE, for good cause shown, the Court hereby APPROVES the
4 Stipulation to extend Ibuumerang's opposition from November 29, 2021 to December
5 6, 2021 and to extend the deadline for Defendant's reply from December 13, 2021 to
6 December 20, 2021.

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8 **SO ORDERED:**

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10 Date: November 30, 2021

James C. Mahan
11 HON. JAMES C. MAHAN
12 UNITED STATES DISTRICT JUDGE

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